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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS'
SUPPLEMENTAL REPORT ON
RESPONSES TO TENTH OMNIBUS
OBJECTION TO CLAIMS (PLAN
PASSTHROUGH ENVIRONMENTAL
CLAIMS) AND REQUEST FOR ORDER BY
DEFAULT AS TO UNOPPOSED
OBJECTIONS**

[Re: Dkt. No. 8988]

**Resolving Objections Set for Hearing
October 13, 2020 at 10:00 a.m. (Pacific Time)**

1 **SUPPLEMENTAL REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**” or as reorganized pursuant to
4 the Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the
5 “**Chapter 11 Cases**”) hereby supplement the *Reorganized Debtors’ Report on Responses to*
6 *Reorganized Debtors’ Tenth Omnibus Objection to Claims (Plan Passthrough Environmental Claims)*
7 *and Request for Order By Default As to Unopposed Objections* [Docket No. 9217] (the “**First**
8 **Report**”), and request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United
9 States District Court for the Northern District of California, as made applicable to these Chapter 11
10 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*,
11 entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order
12 by default on the *Reorganized Debtors’ Tenth Omnibus Objection to Claims (Plan Passthrough*
13 *Environmental Claims)* [Docket No. 8988] (the “**Tenth Omnibus Objection**”).

14 **RELIEF REQUESTED IN THE TENTH OMNIBUS OBJECTION**

15 The Tenth Omnibus Objection seeks to disallow and expunge the Proof(s) of Claim listed in the
16 column headed “Claims to be Expunged” in Exhibit 1 to the Tenth Omnibus Objection.

17 **NOTICE AND SERVICE**

18 A *Notice of Hearing on Reorganized Debtors’ Tenth Omnibus Objection to Claims (Plan*
19 *Passthrough Environmental Claims)* was filed concurrently with the Tenth Omnibus Objection on
20 September 3, 2020 [Docket No. 8991] (the “**Notice of Hearing**”). The Tenth Omnibus Objection, the
21 supporting declaration of David Kraska [Docket No. 8990], and the Notice of Hearing were served as
22 described in the *Certificate of Service of Andrew G. Vignali*, filed on September 15, 2020 [Docket No.
23 9044] (the “**Certificate of Service**”). As further described in the Certificate of Service, on September
24 4, 2020, each Proof of Claim listed on Exhibit 1 to the Tenth Omnibus Objection received the *Notice of*
25 *the Reorganized Debtors’ Tenth Omnibus Objection to Claims (Plan Passthrough Environmental*
26 *Claims)*, customized to include the claim number, debtor, claim amount and priority, and the basis for
27 objection of the disallowed claim, and claim number and claim amount and priority of the surviving
28

claim for each counterparty. The deadline to file responses or oppositions to the Tenth Omnibus Objection has passed.

CONTINUED CLAIMS

As noted in the First Report, the Reorganized Debtors received informal responses with respect to the following claims (the “**Continued Claims**”), for which the Reorganized Debtors agreed to extend the respective claimants’ deadlines to respond to October 9, 2020, and continue the hearing on the Tenth Omnibus Objection with respect to the Continued Claims to October 28, 2020 if the Reorganized Debtors’ objections could not be resolved:

Claimant	Claim No.
Dan Clarke	66542 67768
San Francisco Herring Association	68099 67904
Laura Hart	66588 67769
Jeff and Lindsay Jurow	66940 66280 61436 65933
Dennis Caselli	67764 67765
Brian and Susan Keene	66354 66671
Negar Rajabi	67017 66097

After filing the First Report, and following consultation between counsel, counsel for the above-identified Claimants holding the Continued Claims have informed the undersigned counsel for the Reorganized Debtors that those Claimants do not oppose the expungement of the Continued Claims.

STATE AND FEDERAL AGENCY CLAIMS

Counsel for various state and federal agencies (the “**Governmental Units**”) raised informal objections to the Tenth Omnibus Objection. These informal objections were omitted from the First

1 Report in error. Following consultation between counsel, the Reorganized Debtors agreed to revise the
2 proposed order to include the additional language in paragraph 2 that references the Plan's treatment of
3 Environmental Claims and Environmental Performance Obligations.

4 **DECLARATION OF NO OPPOSITION RECEIVED**

5 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

6 1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the
7 Reorganized Debtors

8 2. I have communicated by exchange of emails with Stuart Gross and Matthew Metzger.
9 Mr. Gross represents all the Claimants that hold Continued Claims identified above; Mr. Metzger is his
10 co-counsel representing Claimant Dan Clarke. Messrs. Gross and Metzger have each confirmed to me
11 by email on October 6, 2020, that their clients do not oppose the expungement of their Continued Claims
12 as requested in the Tenth Omnibus Objection.

13 3. In communications between counsel for the Governmental Units and for the Reorganized
14 Debtors, the parties agreed to resolve the concerns of the Governmental Units by including paragraph 2
15 in the proposed Order, and on that basis the Governmental Units agreed not to file an opposition to the
16 Objections.

17 4. This declaration was executed in Oakland, California.

18 WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and
19 expunging the Proofs of Claims listed in the column headed "Claims to be Expunged" in **Exhibit 1** to
20 this Supplemental Request, which listed Claims are identical to those listed in Exhibit 1 to the Tenth
21 Omnibus Objection, except as otherwise discussed above or in the First Report.

22
23 Dated: October 7, 2020

KELLER BENVENUTTI KIM LLP

24 By: /s/ Peter J. Benvenuti
25 Peter J. Benvenuti

26 *Attorneys for Debtors and Reorganized Debtors*
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